

**UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FILED
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2005 OCT 11 A 11:27

Albert William Bleau Jr.

Plaintiff

Vs.

Greater Lynn Mental Health
& Retardation Association, et al,

Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS.

Civil Action
No. 04 – 10469REK

**Additional Local Rule 56.1 Statement Of Material Facts of Plaintiff Albert W.
Bleau Jr. In Support of Plaintiff's Motion For Summary Judgment and For
Discovery**

And

**In Support of Plaintiff's Objection to Defendant's Motion of August 9, 2005
To Dismiss Plaintiff's Breach Of Contract Claim or For Partial Summary
Judgment**

Pursuant to Local Rule 56.1, Plaintiff Albert W. Bleau Jr., requests that the Local Rule 56.1 Material Statement of Facts filed on October 4, 2005 be amended as follows: Change page 9, section 10, line 4 from "GLMHRA submitted a new draft severance agreement on November 1, 2000 that for the first time included the requirement that the plaintiff resign from EMHC" to "GLMHRA submitted a new draft severance agreement on October 24, 2000 that

for the first time included the requirement that the plaintiff resign from EMHC”.

Plaintiff additionally requests that the amended Local rule 56.1 Statement of Material Facts filed on October 4, 2005 be amended to include additional attachments as follows: April 21, 2000 letter to defendant MacKleish; October 19, 2000 letter to Jack Pizer of the Pension Assistance Project of the University of Massachusetts; an October 27, 2000 letter from Mary Dullinger of the State Attorney General's Office; Plaintiff's letter of April 11, 2001 to GLMHRA responding to their advertisement for a CFO; Atty. Laurence Donoghue's letter to the plaintiff voiding all GLMHRA's remaining responsibilities under the severance agreement and requiring the plaintiff to continue with his responsibilities.

Plaintiff requests that certain correspondences with original signatures be accepted for the record, specifically the following: August 14, 2000 correspondence from Attorney Laurence Donoghue; August 25, 2000 correspondence from Attorney Donoghue; October 24, 2000 correspondence from the EEOC's Rance Quinn; October 25, 2000 correspondence from EEOC's Kathleen Clarke; May 14, 2000 correspondence from Attorney Donoghue; April 27, 2001 correspondence from Atty. Laurence Donoghue; September 25, 2001 correspondence from Attorney Timothy Frawley and a December 27, 2001 correspondence from Attorney Donoghue.

Respectfully submitted,

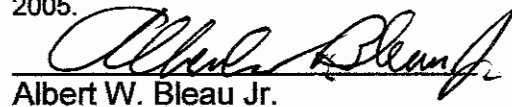


Albert W. Bleau Jr.
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Dated: October 11, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record by First Class Mail on October 11, 2005.


Albert W. Bleau Jr.